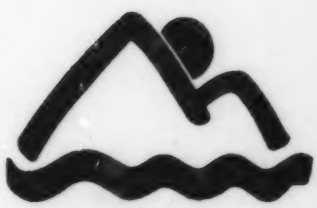
BC Environment

Summary of Written Responses to: *New Directions in Pesticide Management* Pesticide Management Program Five-Year Strategic Plan



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SUMMARY OF WRITTEN RESPONSES TO:

NEW DIRECTIONS IN PESTICIDE MANAGEMENT

PESTICIDE MANAGEMENT PROGRAM

FIVE-YEAR STRATEGIC PLAN

Ministry of Environment, Lands and Parks
Pesticide Management Branch

February, 1992

Prepared by
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Pesticide Management Branch

Province of British Columbia

OFFICE OF THE ASSISTANT DEPUTY MINISTER

Ministry of Environment

Lands and Parks

Parliament Buildings
Victoria
British Columbia
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92-06623/

February 1992

Dear Stakeholders:

I am pleased to present a summary of the written responses to the proposed Five-year Strategic Plan for the Pesticide Management Program. The process of consulting with stakeholders toward redesigning the Pesticide Management Program began in 1990 and will proceed toward a revision of the legislation.

BC Environment wishes to thank each of the people who reviewed *New Directions in Pesticide Management* and provided written comments and many useful criticisms. The public response will assist our efforts to improve the pesticide management plan and legislation.

Yours sincerely,

J. O'Riordan

Dr. Jon O'Riordan
Assistant Deputy Minister
Environmental Management Department

EXECUTIVE SUMMARY

The Pesticide Management Branch received 135 written submissions on *New Directions in Pesticide Management*. The majority, 68% expressed positive impressions of the document, 13% were neutral and 19% were negative. The five major issues by number of comments received are:

1. Promoting alternatives to pesticides

2. Promoting reduction of pesticides

3. Purpose and membership of the proposed Pesticide Management Advisory Committee

4. Public education and involvement

5. Legislative review

The report includes the key themes and comments provided by contributors.

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INTRODUCTION:

In August 1991, the Pesticide Management Branch, Ministry of Environment, Lands and Parks mailed the 12 page *New Directions in Pesticide Management* document to approximately 2,500 people who were recognized as *stakeholders* or those having a stake in decisions on pesticide management. In addition, hundreds of copies were circulated by each of the BC Environment regional offices. An introductory letter requested written comments about the Five-Year Plan and a response form was included asking for broad impressions and areas which required more or less emphasis. Stakeholders were invited to comment by using the form provided or in any other format.

A total of 135 written responses were received.

This document summarizes the written comments received.

PURPOSE:

New Directions in Pesticide Management is a discussion paper which reflects the current views of BC Environment staff on how pesticides should be managed in British Columbia for the next five years.

Written comments received will be used by BC Environment staff to:

1. Identify areas that require clarification or definition.

2. Better understand the needs of stakeholders.

3. Anticipate the impacts of changes to proposed changes.

4. Take advantage of ideas and suggestions toward improving the strategic plan.

In addition, and not at all least important, the comments will be circulated in this summary format to contributors and other stakeholders to assist in the discussion process.

RESPONDENTS:

A total of 135 written submissions were received from the following. See Appendix I for the individual contributors.

AFFILIATION	NO. OF RESPONSES
1. Public Associations/Labour Groups	12
2. Agriculture Sector	6
3. Federal Government	9
4. Pesticide Distributors & Vendors	10
5. Practitioners (Pesticide & IPM)	25
6. Industrial/Forestry Sector	22
7. Professional Associations	5
8. Provincial Government	19
9. Crown Corporations	3
10. Academic	5
11. Municipal	14
12. Private Individuals	5

SUMMARY OF COMMENTS:

Major points and themes occurring in the written submission are reported below. There is no intent to evaluate the validity of the comments here. Stakeholder comments are identified by *italics* although the wording may be slightly changed from the original wording for brevity.

The three questions asked on the response form are reported separately, followed by comments on the specific objectives and activities.

RESPONSE FORM:

1. **What are your broad impressions of the document, *New Directions in Pesticide Management*?**

   68% of the respondents were positive. Comments ranged from slightly supportive:

   Cautiously optimistic; and *Good first step,*

   to strongly supportive:

   Very positive. A major step forward; and *Excellent and about time.*

13% of the respondents were neutral or not committed.

19% of the respondents were negative. Generally negative criticisms contained the following:

- Criticisms of intent:
  Looks like an anti-pesticide agenda; and
  Just a political reaction to public perception.
- Criticisms of style:
  Too broad, vague, and sweeping; and
  Mostly redundant.
- Criticisms of substance:
  Lacking justification;
  Broad generalizations of what could be wrong with general ideas and of what could fix them; and
  Better enforcement of existing regulations would be more cost-effective.
- Criticisms of scope:
  Lacks teeth; and
  Scope too broad for current PMB staffing.

2. What areas require *more emphasis* in this program?

This section received the most responses. Major themes represented were as follows:

- *Define the terms:*

IPM	unnecessary use
sustainable environment	private sector
ecologically safe pesticides	risk
economic incentives	safe pesticide
pesticide	reductions
hazardous	pest management
major users	pest control

- *More education of the public in pesticide issues to include:*

  - *factual presentation of hazards and impacts;*
  - *proper domestic use;*
  - *benefits of pesticides;* and
  - *alternatives to pesticides.*

- *More regulations and enforcement should be redirected toward agriculture and urban use.*

- *More evaluation and consideration of economic impacts to growers and industry.*

- *A wider range of pesticide registrations* to *assist in IPM programs* and to *allow B.C. to be competitive with foreign producers.*

- Other areas suggested for more emphasis:

  - *Describe relationship with federal registration review;*
  - *Educating the media;*
  - *The role of enforcement;*
  - *Public involvement in decisions;* and
  - *Public right-to-know legislation.*

3. **What areas require *less emphasis* in this program?**

- *Legislation and regulation requires less emphasis,* particularly:
  - *permits;*
  - *litigation against industry;*
  - *all areas except enforcing current regulations;* and
  - *reporting requirements for retailers.*

- *Reduce emphasis on integrated pest management and pesticide eduction:*
  - *IPM is overstated;*
  - *Reduction is promoted without reasons;* and
  - *IPM should not be the primary objective of the PMB.*

- *Reduce references to the hazards of pesticides.*

SPECIFIC COMMENTS ON THE STRATEGIC PLAN

INTRODUCTION, (pg. 1)

para 1 *$22 million implies a massive assault on the environment, but this is clearly not the case if as in paragraph 4, 98% are in compliance.*

para 2 *Does the ministry actually intend to regulate mechanical controls as implied?*

para 3 *The 'public' wishing to participate includes those who are concerned about irrational, emotional concerns gaining too much input in the decision-making processes.*

MISSION STATEMENT

The mission of the Pesticide Management Program is to promote integrated pest management (IPM) strategies and regulate pesticide use to achieve a sustainable environment for British Columbia.

- *Why emphasize regulations when management and education are better tools to achieve a sustainable environment?*

- *How will regulating pesticides assist in achieving a sustainable environment?*

- *This primary statement of mission should include a mention of protecting health.*

MISSION PRINCIPLES

Protection: **Protect environmental resources and human health.**

- *Animals should not be considered as resources.*

Education: **Provide information to the public about pest management strategies.**

- *Add information about safe, responsible pesticide use.*

Participation: **Involve the public in key decisions affecting pesticide management activities.**

- *Ensure the public is properly informed first.*

Reduction: **Reduce hazardous and unnecessary pesticide use in the province.**

- *Hazardous and unnecessary uses should be eliminated, not just reduced;*

- *This implies registered uses are not safe when, in fact, they are;* and
- *Controlling the ways pesticides are used could reduce hazards without necessarily reducing their use.*

STRATEGIC OBJECTIVE ONE

PROMOTE INTEGRATED PEST MANAGEMENT ACTIVITIES IN BRITISH COLUMBIA

- *It is not the mandate of PMB to determine the need for a pest management activity. Other ministries and the private sector promote IPM better;*
- *IPM is already being used in the structural pest, forestry and agriculture industries;*
- *There is a demand for IPM in agriculture which is limited by the lack of qualified personnel, IPM compatible pesticides, scientific action thresholds, monitoring techniques, and consumer education;* and
- *Adopt the definition of IPM used by the Vancouver Parks Board.*

KEY ACTIVITIES

1.a ***Encourage and promote the reduction of pesticide use and pesticide-related impacts in the environment.***

The specific proposal of striving for a 25% reduction by the year 2001 raised numerous concerns:

- *Why was 25% determined as an appropriate objective for reduction?;*
- *How will the 25% reduction be measured; by weight, volume, area of crop treated, etc?;*
- *1991 is not an appropriate baseline, average for 3 - 5 years to measure change;*
- *Will industries which have already reduced be unduly penalized?";* and
- *25% is inadequate. Ontario is striving for a 50% reduction by 2002.*

The methods of achieving reduction raised other concerns:

- *Reducing the impact of pest management activities could involve increasing pesticide use if that is the least damaging method of controlling pests;*

- An economic incentive to use alternatives could:
  disrupt certain IPM programs;
  create a subsidy for less efficient controls; and
  encourage more damaging control methods.
  - *The Province should more thoroughly study and explain how economic incentives could be applied;* and
  - *Economic impacts to agriculture and industry should be considered before reducing pesticide use.*

1.b ***Encourage and promote the use of alternatives and integrated pest management strategies.***

The statement:
Alternatives will be selected where potential risks are less than, and economic benefits are greater than, those of pesticides also raised numerous concerns:

- *Replace with value assessment;*
- *Consider long-term environmental costs and benefits;*
- *This determination should be left to professionals (foresters);*
- *These cost comparisons will be difficult;*
- *PMB should be primarily concerned with risk and not economics;*
- *IPM includes the determination of economical and environmentally sound treatments;* and
- *Simplify criterion of use to human and environmental safety.*

In addition, the list of alternative and IPM strategies raised:
- *IPM includes the use of pesticides;* and
- *Refer to ecologically safer pesticides"*

1.c ***Coordinate pest management strategies with other government agencies and private sector organizations.***

- *Include educational institutions;* and
- *Coordinate with federal initiatives.*

1.d ***Document existing integrated pest management activities in British Columbia.***

- *Excellent concept;*
- *Include Forestry Canada's database;* and
- *This is an unnecessary duplication of effort.*

1.e ***Identify integrated pest management strategies used elsewhere which could be utilized in British Columbia.***

- *Make this an on-going activity, including U.S. sources.*

1.f ***Encourage and fund research into new integrated pest management methods.***

The predominant response concerned the funding:
- *$200,000 is a token, inadequate amount;*
- *Consider taxing pesticides to develop alternatives;*
- *How can we access the money for research?*; and
- *Provide funds to active research organizations.*

In addition:
- *Since funding is limited, promote cooperation between the federal government and private industry, and concentrate on a limited number of priorities at a time*; and
- *Ensure research is practical with relevance at the application level.*

1.g ***Develop policy, legislative, procedural and regulatory initiatives to promote integrated pest management strategies such as Corporate Pest Management Plans.***

Several corporate stakeholders objected to the implication that industry currently relies *solely* on pesticides. Other comments include:

- *Don't issue permits unless the applicant has investigated and considered alternatives*; and
- *This would heighten awareness of integrated control.*

1.h ***Ensure that training for pesticide applicators includes integrated pest management theory and practice.***

- *This is already part of some agricultural and industrial certification courses;*
- *Why introduce so gradually?;*
- *Perhaps include dispensers*; and
- *Issue certification for IPM.*

STRATEGIC OBJECTIVE TWO

REGULATE THE SALE AND USE OF PESTICIDES IN B.C. AND MONITOR THEIR EFFECTS ON HUMAN HEALTH AND THE ENVIRONMENT

- *Involve industry in all proposed changes;*
- *Address disposal for which regulations and facilities are lacking;* and
- *Reverse the trend to more paper reporting and conduct more on-site inspections.*

Key Activities

2.a ***As part of the overall review of B.C.'s environmental legislation, review the existing pesticide provisions and integrate them into the comprehensive environmental protection legislation prepared by the ministry.***

- *Involve stakeholders in legislation review;*
- *Reform the legislation;*
- *Increase penalties;* and
- *Enough legislation is already in place.*

Specific comments concerning the appeal process:

- *Require sufficient cause before an appeal is accepted;*
- *Permittee shouldn't be required to defend the regulatory process;*
- *Permittee should be required to defend treatment but not alternatives;* and
- *Remove the $25 appeal fee.*

Other concerns:

- *Private and public lands should be regulated the same way;*
- *State the goal of promoting IPM in legislation;*
- *Will the legislated mandate include IPM?;*
- *Define 'adverse' effects in legislation;* and
- *Use legislation to encourage compliance with 'codes of good practice' developed by industry.*

2.b ***Increase efforts to review, monitor and enforce pesticide application on private property.***

- *PMB should consider a study to determine adequate regulation of pesticides on farms;*
- *What percentage of farms will be inspected?;*
- *100 sites per year is too low;*
- *Monitor soil and water for priority pesiicides;*
- *Private land use may create the greatest impacts;* and
- *A more cooperative educational approach may be more effective on private land.*

2.c ***Evaluate the pesticide permit application process and identify ways to make it more responsible, efficient and participatory.***

- *Modify the appeal process to require sufficient cause before an appeal is accepted;*
- *Public involvement must be timely to avoid unreasonable delays;* and
- *Long overdue introduction of Ombudsman's recommendations.*

2.d ***Ensure that the Pesticide Management Program is able to effectively review, monitor and enforce pesticide application on public lands.***

- *Monitoring and enforcement should be increased;*
- *Pesticide Management Advisory Committee could conduct the audits;* and
- *Extend permit requirements to private lands.*

2.e ***Develop training standards to ensure certified applicators and dispensers are adequately trained to protect human health and the environment.***

- *Include IPM in training standards;*
- *Aerial certification is required;*
- *Training should be more practical;*
- *Consider an apprentice program for applicators;*
- *Ensure B.C. standards meet or exceed national standards being developed;* and
- *All commercial applicators should be certified.*

2.f ***Ensure that companies which sell pesticides or apply pesticides as a service comply with safety, training and standards of certification requirements.***

- *More inspections of job sites are necessary; and*
- *More enforcement is required for municipal governments.*

2.g ***Ensure that conditions of pesticide vendor and pest control service licences are fulfilled, and that proper sales and use records are kept.***

- *There is no commitment to adequate funding.*

2.h ***Ensure that pesticide residue levels in food and natural waters are below regulated tolerance levels.***

- *Actual level of monitoring should be stated;*
- *Increase monitoring of food and groundwater;* and
- *Coordination with other monitoring programs and agencies is essential;*

2.i ***Coordinate the program's pesticide regulatory efforts with those of other governmental agencies and private organizations.***

- *Involve the Workers' Compensation Board.*

2.j ***Ensure that pesticide residue levels do not harm the environment or human health.***

- *This appears to be a duplication of the federal registration process;*
- *Establish priorities and deal with most hazardous first;* and
- *What criteria will be used to select pesticides which cause an adverse effect?*

STRATEGIC OBJECTIVE THREE

INFORM THE PUBLIC ABOUT RISKS, OPPORTUNITIES FOR ALTERNATIVES, AND REGULATORY DECISION-MAKING PROCESSES ASSOCIATED WITH PESTICIDE USE IN THE PROVINCE

- *Include information on the benefits of pesticide use;*
- *Ensure information is scientifically valid;*
- *This is an important objective which has been ignored by PMB;*
- *Include municipal authorities in this program;* and

- *Lack of public trust may hamper the objective.*

3.a ***Develop a comprehensive communication plan to educate the public about the ministry's involvement in pest management.***

- *Include information on safety, risks and benefits as well as pest management*; and
- *Direct information to applicators who may now rely on the press for much of their information.*

3.b ***Conduct public workshops on pest management strategies.***

Strong support was shown for this activity:
- *Start earlier than 1994*; and
- *Involve other ministries and industries.*

3.c ***Promote the availability of pesticide certification courses.***

- *Courses should be mandatory;*
- *Exams should be more difficult.*

3.d ***Produce and distribute educational material about pest management strategies.***

- *Develop with other agencies to create a uniform message*; and
- *Include information on safe and responsible pesticide use.*

3.e ***Produce and distribute a newsletter to inform pesticide users and the public about current issues and developments in pest management.***

- *We don't need another newsletter;*
- *Contribute to other publications such as government newsletters sent to all households*; and
- *Pamphlets and fact sheets would be preferred.*

3.f ***Promote timely public participation in decisions affecting pesticide permit applications.***

- This system allows resolution of concerns before appeals;
- *Public education should also alleviate concerns*; and
- *Improve public notification of applications for permits using municipal halls, post offices, community halls and local newspapers.*

3.g *Ensure that the public receives adequate notice of proposed pesticide use on public lands and that pesticide use information is readily available.*

- *Public has a right to know wherever pesticides are used;*
- *Notification should be legislated and not left for by-laws;*
- *Notification and posting makes applications difficult;* and
- *Perimeter posting materials and coverage should be improved.*

Some of the responses referred to notification requirements of public land uses under permits:

- *Advertise in each year of multiple year permits;*
- *Consult with major permit holders before changing notification requirements;* and
- *No new legislation is required - use permit conditions.*

PROPOSED PESTICIDE MANAGEMENT ADVISORY COMMITTEE

PURPOSE

- *IPM should not be part of its function since it is not regulated;*
- *Committee could direct monitoring and investigations;*
- *Expand purpose to advise provincial Ministers of Agriculture, Fisheries and Food, Forestry and Health as appropriate;*
- *Should also advise other regulatory agencies involved with pesticides;*
- *Should advise the Administrator on permits instead of assist;* and
- *This committee should produce reports for public use.*

MEMBERSHIP

Most comments on the proposed committee concerned membership:

- *How will members be selected for industry and environmental groups?;*
- *Public participation may be impossible to implement;*
- *Too much government representation and not enough industrial representation;*
- *Extremist organizations should be avoided;*
- *How would confidential matters be handled if non-government stakeholders are present?;* and
- *Find another way to involve stakeholders who may inhibit the work of this committee.*

SUGGESTED MEMBERS

Written comments on the proposed membership of the Pesticide Management Advisory Committee included suggestions to add the following:

Academic representation
Association of B.C. Professional Foresters
Association of Professional Biologists
Forest Industry Associations (COFI, NILS, ILMA)
Forestry Canada
Health Protection Branch
Integrated Vegetation Management Association
Municipal representation
Professional Pest Management Association

APPENDIX I
List of Contributors

1. Public Association/Labour Groups

Arrowsmith Ecological Association
British Columbia Coalition for Alternatives for Pesticides
Brotherhood of Maintenance of Way Employees
Canadian Earthcare Society
Consumers' Association of Canada (B.C.)
Ford Society
Fort St. John Trappers' Association
Fraser-Burrard Hospital Society
North Peace Sustainable Development Committee
Revelstoke Environnmental Action Committee
Sustainable Living
Western Canada Wilderness Committee

2. Agriculture Sector

Advance Orchard Co. Ltd
B.C. Tree Fruits Ltd.
Coast Agri, ProTect
Hazelmere Farms
Island Organic Producers
Western Greenhouse Growers' Co-operative Association

3. Federal Government

Agriculture Canada, Vancouver Research Station
Agriculture Canada, Vancouver Research Station
Agriculture Canada, Agassiz Research Station
Agriculture Canada, Pesticides Directorate
Agriculture Canada, Summerland Research Station
Dept. of Fisheries and Oceans, Vancouver
Forestry Canada, Pacific Forestry Centre
Forestry Canada, Pacific Forestry Centre
Health & Welfare Canada, Health Protection Branch

4. Pesticide Distributors & Vendors

Agrico Sales Ltd.
Art Knapp Nurseries Ltd.
Art Knapp Plantland

Blight's Home Hardware
Buckerfields
Crop Protection Institute of Canada (CPIC)
East Chilliwack Consumer's Co-op
Long Lake Nursery
Noel Roddick Ltd.
Retailer (unspecified)
Sharp & Son

5. Practitioners (Pesticide & IPM)

A-Target Pest Services Ltd.
Al's Tree Service
Andy's Landscaping & Repair Service
Bel-Aire Helicopters
Biodynamic Consulting
BioSafe Horticultural Services
Boultbee Pest Control Ltd.
E.S. Cropconsult Ltd.
Gills Pest Control
Integrated Crop Management Inc.
K & H Lawn Care Ltd.
Landscape Maintenance
Meadow-Ridge Weed and Pest Control Ltd.
Mr-Green-Up
Murakami Gardening Services
Nutri-Lawn (Vancouver)
Nutri-Lawn (Victoria)
Pacific Regeneration Technologies Inc.
Paratex B.C. Pest Control Ltd.
PCO Services Inc.
Summit Nursery Ltd.
Surrey Pest Control Ltd./Beacon Pest Control Ltd.
Val's Gardening Service
Van Herricks Environmental Planting
Weed Man

6. Industrial/Forestry Sector

BC Gas Inc.
Canadian Forest Products Ltd.
Canadian National Railway
Canadian Pacific Forest Products Limited
Council of Forest Industries of B.C. (Prince George)

Council of Forest Industries of B.C. (Vancouver)
Domtar Inc., Wood Preserving Divn., Burnaby
Domtar Inc., Wood Preserving Divn., Montreal
Interior Lumber Manufacturers' Association
International Forest Products Ltd.
MacMillan Bloedel Ltd., Eve River Divn.
MacMillan Bloedel Ltd., Northwest Bay Divn.
MacMillan Bloedel Ltd., Northwest Bay Divn.
MacMillan Bloedel Ltd., Stillwater Woodlands Divn.
MacMillan Bloedel Ltd. (Vancouver)
Marlita Forestry
Prettys' Timber Co. Ltd.
Sylva Management Services Ltd.
Weldwood of Canada Limited
Western Forest Products Limited
Weyehaeuser Canada Ltd.
Whistler Golf Course

7. Professional Associations

Association of British Columbia Professional Foresters
B.C. Medical Association
Integrated Vegetation Management Association of B.C.
Planning Institute of British Columbia
West Coast Environmental Law Association

8. Provincial Government

Min. of Agriculture, Fisheries and Food, Crop Protection Branch
Min. of Agriculture, Fisheries and Food, (Dawson Creek)
Min. of Agriculture, Fisheries and Food, (Penticton)
Min. of Environment, Lands & Parks, Integrated Management Branch
Min. of Environment, Lands & Parks, Water Management Branch
Min. of Forests, Invermere
Min. of Forests, Mackenzie
Min. of Forests, Port Alberni
Min. of Forests, Powell River
Min. of Forests, Prince George
Min. of Forests, Protection Branch
Min. of Forests, Research Branch, Victoria
Min. of Forests, Research Branch, Victoria
Min. of Forests, Revelstoke
Min. of Forests, Silviculture Branch
Min. of Forests, Surrey

Min. of Forests, Timber Harvesting Branch
Min. of Forests, Vancouver
Min. of Health, Environmental Health

9. Crown Corporations

B.C. Hydro & Power Authority, Pest Management
B.C. Hydro & Power Authority
Workers' Compensation Board of British Columbia

10. Academic

Malaspina College
Simon Fraser University, Dept. of Biological Sciences
University of British Columbia, Plant Science Dept.
University of British Columbia, Forest Sciences Dept.
University of Guelph, Dept. of Environmental Biology

11. Municipal

City of Kamloops, Parks Department
City of Kelowna, Parks Department
City of Penticton, Parks Department
City of Victoria, Parks & Recreation
District of Squamish
District of Surrey, Engineering Dept.
Maple Ridge Parks & Recreation
Regional District Comox-Strathcona
Resort Municipality of Whistler
School District No. 14 (Southern Okanagan)
The Corporation of Delta
Van Dusen Botanical Display Garden
Vancouver Parks Board
Vancouver School Board

12. Private Individuals (5)